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Acting Under Authority Conferred By 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-258 EJD
	)	
Plaintiff,	)	JULY 7, 2020 DECLARATION OF AUSA
	)	ROBERT S. LEACH IN SUPPORT OF UNITED
v.	)	STATES' OPPOSITION TO DEFENDANT
	)	ELIZABETH HOLMES' MOTION TO STRIKE
ELIZABETH HOLMES and RAMESH	)	RULE 404(b) NOTICE OR, IN THE
"SUNNY" BALWANI,	)	ALTERNATIVE, COMPEL ADEQUATE RULE
	)	404(b) DISCLOSURE
Defendants.	)	
	)	Date: July 20, 2020
	)	Time: 1:30 p.m.
	)	Courtroom: 4, 5th Floor
	)	

I, Robert S. Leach, declare as follows:

1. I am an Assistant United States Attorney with the United States Attorney's Office for the Northern District of California ("USAO"). I am one of the prosecutors assigned to this matter and have been since 2016. I make this declaration in support of the United States' Opposition to Defendant Elizabeth Holmes' Motion to Strike Rule 404(b) Notice or, in the Alternative, Compel Adequate Rule 404(b) Disclosure.

